

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RAMON VILLANUEVA-BAZALDUA  
individually and on behalf of others similarly  
situated,

Plaintiff

CA 1:06-cv-00185-GMS

Class Action

v.

TRUGREEN LIMITED PARTNERS and  
TRUGREEN, INC.

Defendants.

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**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Now comes Plaintiff and moves this Court for an extension of time until June 4, 2007 to file his reply brief in support of his motion for leave to amend his complaint. In support of this motion Plaintiff would show the Court as follows:

1. On May 23, 2007 counsel for Plaintiff conferred with counsel for Defendants who indicated that Defendants do not oppose this motion.
2. Plaintiff's Reply Brief in support of his motion for leave to file an amended complaint is currently due May 29, 2007.
3. On May 16, 2007, the day before Plaintiff received Defendants' Opposition to the Motion for Leave to Amend, a fire severely damaged the house that Plaintiff's counsel Edward Tuddenham recently purchased in New York City. Mr. Tuddenham and his family were planning on moving from Cambridge, Massachusetts to New York City in early June. Because of numerous unexpected obligations arising as a result of this fire, Plaintiff's counsel necessitates

an extension of time until June 4, 2007 to file Plaintiff's reply brief.

4. The interests of justice will be served by granting this motion.

Respectfully submitted,

/s/ Vivian L. Rapposelli

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ATTORNEYS FOR PLAINTIFF



CERTIFICATE OF SERVICE

I certify that on this 24th day of May, 2007, I served the foregoing document on Defendants by e-mailing it to the Defendant's attorneys as follows:

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/s/ Vivian L. Rapposelli

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